

**EXHIBIT 6**

**Defendant's Answers to Plaintiffs' Second Request  
for Discovery, dated Nov. 17, 2010**

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION

MELISSA DRAKE,  
MADELYN DEJUSTO and  
DOUGLAS A. SPRINGSTEAD,

Plaintiffs,

Case No: 1:10-cv-185

v

Hon. Robert J. Jonker

BRIANNA SCOTT,

Defendant.

---

Thomas V. Hubbard (P60575)  
DREW COOPER & ANDING PC  
Attorneys for Plaintiffs  
Aldrich Place Suite 200  
80 Ottawa Ave., NW  
Grand Rapids MI 49503  
(616) 454-8300

Paul A. McCarthy (P47212)  
Stephen J. Hulst (P70257)  
RHOADES MCKEE PC  
Attorneys for Defendant  
600 Waters Building  
161 Ottawa Ave., NW  
Grand Rapids, MI 49503-2793  
(616) 235-3500

---

**DEFENDANT'S ANSWERS TO PLAINTIFFS' SECOND REQUEST FOR DISCOVERY**

NOW COMES Brianna Scott, and makes the following answers to the Second Request for Production of Documents directed to her in the above-entitled matter.

**INTERROGATORIES**

1. Please identify any and all individuals and/or entities who repaired, updated or otherwise worked on the computers used at Drake & Scott, PLLC from November 2009 to present.

**ANSWER:** Geeks, Inc., Wiseman, Inc., Logical Technologies. In addition, Mu (last name unknown) at AFD Solutions, 980 W. Broadway, Muskegon, MI removed the hard drive on Ms.

Drake's computer to determine what had been deleted. The hard drive was turned over to Tom Jensen with Geeks, Inc. and a copy was sent to Ms. Drake pursuant to a court order.

2. Please identify any and all individuals and/or entities who repaired, updated or otherwise worked on the phone system used at Drake & Scott, PLLC from November 2009 to present.

**ANSWER:** Defendant is not aware of anyone who repaired, updated or otherwise worked on the phone system from November 2009 to the present.

3. Please identify any and all individuals and/or entities who repaired, updated or otherwise worked on the computer used by Melissa Drake while she was employed at Drake & Scott, PLLC from November 2009 to present.

**ANSWER:** To the extent any work was done, Defendant believes it would have been performed by the companies/individuals identified in response to Interrogatory No. 1.

4. From January 2010 to present, please identify the location of the computer(s) used by Melissa Drake while she was employed by Drake & Scott, PLLC.

**ANSWER:** Ms. Drake took her computer that she used at Drake & Scott.

#### **REQUESTS FOR PRODUCTION OF DOCUMENTS**

1. **Request for Production No. 1:** Please produce, in native electronic form, any and all emails authored or received by Melissa Drake or Doug Springstead on any computer, server, hard drive or other electronic storage device used by Drake & Scott, PLLC and/or Brianna Scott from November 2009 to March 2010.

**RESPONSE:** Defendant objects as this request seeks irrelevant information and is unduly burdensome and/or expensive.

2. **Request for Production No. 2:** Please provide any and all billing statements from Springthrough Consulting, Weisman Brothers, Geek Squad, Geeks, Inc. or anyone or any entity who had access to or otherwise worked on the computers at Drake & Scott, PLLC.

**RESPONSE:** See attached for the documents Defendant could locate in response to this Request.

3. **Request for Production No. 3:** A complete copy of the internal hard drive of the computer used by Melissa Drake while she was employed by Drake & Scott, PLLC.

**RESPONSE:** Defendant objects to this request as vague, unduly burdensome and/or expensive, and because it seeks irrelevant information. Without waiving these objections, Defendant understands that Ms. Drake has a copy of the requested hard drive in her possession.

4. **Request for Production No. 4:** A complete copy of any external hard drives of the computer used by Melissa Drake while she was employed by Drake & Scott, PLLC.

**RESPONSE:** Defendant objects to this request as vague, unduly burdensome and/or expensive, and because it seeks irrelevant information. Without waiving these objections, Defendant is unaware of any hard drives in her possession that are not already in the possession of Ms. Drake.

5. **Request for Production No. 5:** Copies of all "authorizations for legal services" signed for by both Brianna Scott and Plaintiff, Melissa Drake.

**RESPONSE:** Defendant objects as "authorizations for legal services" is not defined, and this request seeks irrelevant information. Defendant further objects to the extent this request seeks information protected by the attorney-client or work-product privileges.

6. **Request for Production No. 6:** Please provide from November 2009 to March 2010, copies of any and all correspondence from Brianna Scott to any other person or entity,

save correspondence to her counsel seeking legal advice, which relates to or references either Melissa Drake or the above-captioned case.

**RESPONSE:** Defendant objects as this request is overly broad, unduly burdensome, seeks irrelevant information, and seeks information protected by the attorney-client or work-product privileges.

7. **Request for Production No. 7:** Please provide any and all appraisals of the property located at 75 W. Apple Avenue, Muskegon, Michigan 49440, including, but not limited to, any graphic depictions of the interior layout of the property attached to such appraisals.

**RESPONSE:** Defendant objects as this request is vague, overly broad and seeks irrelevant information. Without waiving these objections, see appraisals of real property included on attached compact disc.

[REMAINDER OF PAGE INTENTIONALLY LEFT BLANK.]

Dated: Nov 15, 2010

Brianna Scott  
Brianna Scott

STATE OF MICHIGAN )  
COUNTY OF Muskegon) ss.

On this 15 day of November, 2010, personally appeared before me, Brianna Scott, known to me to be the person described above, who being first duly sworn, deposes and says that she has read the foregoing answers to the Second Request for Production of Documents by her subscribed and that the same are true to the best of her knowledge and that she has signed the same as her free act and deed.

Marsha Storch

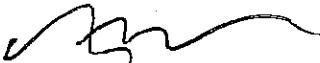
Marsha Storch  
Notary Public, ~~Kent~~ County, MI  
My commission expires: 6/27/2014  
Acting in the County of Muskegon

Dated: November 17, 2010

Respectfully submitted,

RHOADES McKEE PC

By:

  
Paul A. McCarthy (P47212)  
Stephen J. Hulst (P70257)

Attorney for Defendant

Business Address:

161 Ottawa Avenue, N.W., Suite 600  
Grand Rapids, MI 49503-2793  
(616) 235-3500